

# **EXHIBIT**

**3**

UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF NORTH CAROLINA

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

THE UNIVERSITY OF NORTH  
CAROLINA AT CHAPEL HILL, et al.,

Defendants.

Civil Action No. 1:14-cv-954-LCB-JLW

**DECLARATION OF CECILIA POLANCO**

Cecilia Polanco, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Cecilia Polanco, I am over 18 years of age, and I am fully competent to make this declaration.
2. I am a full-time undergraduate student at UNC-Chapel Hill. I am a rising senior and am pursuing a major in Global Studies, with a focus on Health and Environment and Latin America.
3. I am Hispanic.
4. UNC-Chapel Hill was my dream school and my number-one choice when I was applying to colleges. When I received UNC's Morehead Cain Scholarship I withdrew my applications to other schools, even though I was on the wait list at higher ranked schools. I then received the Global Gap Year Fellowship, which allowed me to

take a year before college to travel the world and volunteer. By choosing UNC-Chapel Hill, I was being paid to go to school and being paid for volunteer experiences. Carolina was creating opportunities I wouldn't find anywhere else even before I set foot on campus.

5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities. I came to UNC-Chapel Hill with the perspective of someone who doesn't receive much financial help from my parents. I am often surrounded by peers who had many more opportunities than I had. I applied for scholarships because of need, and while I was lucky enough to receive a merit scholarship, for many of my peers paying for college wouldn't have been an issue. Though I came from a racially diverse high school, I was still one of the only Latina students in attendance in higher-level courses, and one of few students of color who took AP classes. Two minority students from my high school went to UNC Chapel-Hill, and less than a handful attended other top-tier universities. I grew up very conscious of race, how my appearance categorizes me, and what assumptions people have about me. What UNC students don't all have in common is a constant consciousness of their identity. It is important to me that I can express that perspective at UNC.

6. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities that affect my undergraduate experience, including lectures, seminars, residential life, student government, communities of faith, extracurricular activities and community service programs. In particular, I have been

involved with the Foundation for Sustainable Development, NOLS Alaska, and the Carolina Hispanic Association, first as Political Action Chair, then as President. I'm also a Senior Advisor for Student Government and a Mentor and Health and Wellness Advisor for the Scholars' Latino Initiative (SLI). SLI is an organization within UNC-Chapel Hill's Center for Global Initiatives that creates three year mentoring partnerships between UNC-Chapel Hill students and high achieving Latino/a students to prepare the high school students for enrollment in a college or university. These activities and positions benefit enormously from racial and ethnic diversity and by the membership of people with different backgrounds.

7. I currently experience academic and personal benefits from UNC-Chapel Hill's racially diverse student body. For example, before attending UNC-Chapel Hill I had gone most of my life without meeting an academically successful Latino male, which may have created stereotypes in my mind of whether there were any. By meeting and working alongside other Latino students, I realized some of the prejudices I had and how I had made unfair assumptions about others. I've also been able to find peers who can relate to the same racial or ethnic hostility I face sometimes. I've learned about what other people have historically gone through and better understand how racism and social injustices have come about.

8. I believe my education would be harmed if UNC-Chapel Hill stopped considering race in its admission decisions. The current policy facilitates the admission of strong Hispanic students, which improves my educational experience by allowing me

to learn alongside a greater number of Hispanic students so that I do not feel singled out as a spokesperson for my race/ethnicity. The policy likewise facilitates the admission of underrepresented minority students with racial or ethnic backgrounds different from my own and from whom I feel I learn both inside and outside the classroom. Having a diverse student body exposes us to people who think, solve problems, and communicate differently – an exposure that makes us more culturally competent and capable of interacting well with people from different backgrounds. If we don't surround ourselves with people who are different from us in an academic setting, when we are faced with people who are different from us outside of the university, we won't know how to cope, and our initial reactions will be fear, distrust, and maybe even hate.

9. I want to learn and live alongside students who are each a part of a critical mass of their race/ethnicity. To facilitate that, I would like to see an increase in the number and diversity of underrepresented racial groups admitted to UNC-Chapel Hill. I'd like for UNC to be representative of North Carolina or even the United States as a whole. I think that an increase in the number of minority students would make it so people couldn't physically ignore our presence. I often feel invisible as a minority student – I felt this most my first year when I walked around campus and barely saw anyone who looked like me. Even given the current admissions policy, it's possible for a UNC student to make it through their four years here without diversifying their friend group or experiences.

10. I'm usually a minority in everything I'm involved with on campus. It often feels like people aren't expecting for me to perform well, or to be insightful and effective. My intelligence, value, and worth are not assumed at UNC and I often feel like I have to prove myself. One of the hardest days at UNC was after I was interviewed for a local news channel about my academic achievements and involvements on campus. Comments were made alleging that I got into UNC-Chapel Hill because I was Latina, received the scholarships because I was Latina, and had no barriers in attending and paying for college. It was sickening, stressful, and brought me to tears. It brought about a lot of self-doubt and emotional distress that made me question my worth and the value of my accomplishments. To attribute my successes to this one identity is to not fully see me as a person. This type of experience is common among students of color, and other underrepresented student populations.

11. I often feel like the UNC administration contributes to negative experiences among students of color by not affirmatively standing in support of underrepresented students. For example, during a campus scandal related to the athletic department, student government encouraged the student body to wear blue in support of athletes. At the same time, many minority students were wearing black and the Black Student Movement was trying to generate awareness and support of the "Black Lives Matter" movement, but neither the student government nor the administration acknowledged this work. We want our administration to stand in support of our experiences as students, and it seems that only some students' experiences are officially recognized. The

administration tries to be politically correct, and I think there is a serious problem with the power and mindsets of the Board of Governors and the Board of Trustees that harms minority students at UNC-Chapel Hill.

I declare under penalty of perjury that the foregoing is true and correct. Executed  
this 23 day of June, 2015.

Cecilia Polanco  
Cecilia Polanco